

**Department of Housing and Community
Development
Division of Codes and Standards
International Residential Code Project**

Stakeholder Comment Form

Use the TAB key to move from question to question. The form will accept input in the shaded areas only.

- Shaded boxes can be filled by clicking the mouse button or hitting the space bar.
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- Submit any additional supporting information or documentation by email or fax with this form.

Submit to the email or fax number at the end of this form. Please be sure to include a cover sheet identifying the purpose of your fax and send Attn: IRC Project.

Section 1 Stakeholder Recommends	<p><u>1. Summarize issues of concern. 2. Incorporate all appropriate IRC section numbers. 3. In addition, include the necessary section numbers when utilizing the 2007 California Building Standards Code, Title 24, as a cross-reference or comparison document. 4. Please be specific and provide a comprehensive rationale or justification for any recommendation or suggestion offered.</u></p> <p><i>(Text area will accept any amount of text)</i></p>
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➤

A couple of items to keep in mind: First, all codes are guidelines and secondly, there is a difference in the case of building or structural items that might have been 'left-out' of the Code, and the adoption of a residential Plumbing, Electrical or Mechanical code that is significantly different than the codes currently adopted by the State, which does create a major problem. I believe the best course of action is to simply restrict the residential code to Building only, as the sub-trades are more adequately handled in their existing model code documents. For those who wish to have a single document to 'simplify' a basic process of code use, then extracting the appropriate sections from the current codes to use in California's residential code is a relatively simple process, which can be prepared by staff. Remember, it is the California Residential Code, which will be in effect, not the International Residential Code. Consequently, the State may, and should, adopt regulations which are consistent with the regulations currently in effect.

The following are some examples of the wide difference between the two codes:

Shower pans in the IRC (Section 2708.1) are only required to be 900 sq. in vs. 1024 sq. in the CPC (Section 411.7).

Trap-arms in the IRC (Tab P3105.1) at 8ft. are considerably longer than in the CPC (Tab 10-1) at 5ft for a 2" pipe.

The IRC (Sections P3109 & P3110) permits single-stack and circuit-venting, while the CPC (Section 311.4)

specifically prohibits these types of installations.

From these few examples it can be easily seen that the lesser requirements as proffered by the Residential Code do not provide the equivalent level of protection that are secured by the current California Plumbing and Mechanical Codes. Consequently, any thought of producing a single, code, which could be used by a home builder as differentiated from a commercial building developer, should be based on the same requirements currently in force, throughout the State.

Section 2 Views Represent	Please answer the following before submitting your comments.			
	Responses represent my views as an individual			
	x Responses represent a consensus of members of an organization I represent			
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	Bob Adler			
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International Residential Code Project:

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>

Of serious concern to the Alameda County Electrical Apprenticeship is the added time, effort and cost of having to cover two electrical code books in our apprentice and Journeyman instruction. Our Curriculum is based on the NEC. Including the IRC would make it more difficult and confusing for the electrician to perform residential electrical installations. It is also concerning that if an item is not covered in the IRC it refers to the NEC. We can envision situations where an electrician will not be aware of situations that require use of the NEC. The result will be considerable rework with added time and costs to the project.

Byron Benton
Training Director
Alameda County Electrical JATC

Section 2

Views
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Name

Name of organization (please include any acronym)

Address

City

State

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Phone

Fax

Email

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>

Where the current 2007 CBC is deemed deficient, the Department of Housing and Community Development should incorporate the applicable sections of Chapters 3 through 10 of the IRC as a supplement to Part 2 of Title 24 of the CCR. During down cycles of the economy it is extremely difficult for local Jurisdictions to fund the purchase of state mandated texts required by Health and Safety Code § 18942. Reference to the electrical, mechanical, plumbing, energy and fire protection provisions should be by reference to the appropriate parts of Title 24.

If a separate California Residential Code was developed it should be provided to the Jurisdictions and all certified inspectors in their employment at no cost to the Jurisdiction.

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>

Don't adopt the IRC for any electrical codes in the State of Calif.
Thanks.

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Name

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>

My name is Tim Dunn. I'm the plumbing and mechanical specialist for the City of Ventura Fire Department in California. I was the Plumbing and Mechanical plan checker for the City of Thousand Oaks and Combination Building inspector for Ventura County. In my past I was a Plumbing contractor with several plumbers working for me. Currently I serve as Vice Chairman for IAPMO for southern California Chapter. I wanted to give my background for validity. Building departments have been scrambling to adopt new IBC from UBC and educate their personnel for new standards. The Plumbing and Mechanical codes this 2007 cycle have many changes including entire new chapters from NFPA. A bar at left of page in codebook usually designates the 2007 California Plumbing and Mechanical codebook changes. This does not reflect 2003 UPC and UMC changes from codebook only 2006 changes. Having stated this massive influx of new code material cities are handcuffed by economic downturn with no money for education, classes, books or study material. Our City of Ventura is talking layoffs in staff. There is no money for travel for education . Classes must be free of charge for any inspection staff to go and materials free. How are we supposed to learn 4 new codebooks when we just started several? I can't comment on books IPC, IMC, IEC, and IRC when my jurisdiction cannot afford these books and we do not use them. The changes you are suggesting by using separate plumbing, mechanical, electrical and energy code, which we already have, I believe is redundant. How are we to instruct thousands of contractors when you have separate codebooks with different section numbers? The State of California also has a budget crunch in the billions and HCD is formulating a huge impact financially to state and local jurisdictions. Also as the State is going more

environmentally friendly we are proposing 4 redundant books we need to print destroying natural resources. Why not use existing Books for plumbing, mechanical, electrical and energy. I question the timing and purpose of code changes and whom do they really benefit? It will not benefit the enforcing agencies. We are the foot soldiers who must educate and enforce our communities. How does stressing building and fire departments to learn 4 more redundant codebooks help us in protecting public? If the state desires to go to a different set of codes that is fine but not 2 sets of 4 codebooks. I implore the individuals legislating to rethink how many codebooks we need. I will not be attending this meeting because our City of Ventura cannot afford to send me along with all the other cities in our county. I have spoken with my Building official and was given permission to write these concerns.

Thank-you,

Tim Dunn
City of Ventura Fire Department

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Views
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☒ Responses represent a consensus of members of an organization I represent

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Tim Dunn

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>

The California Joint Committee on Energy and Environmental Policy, a joint labor management committee of CAL SMACNA and the union that represents their employees, SMWIA, strongly suggest that we keep the California Plumbing and Mechanical code as is presently in effect. The California Plumbing and Mechanical codes contain all the necessary provisions to cover residential construction.

It is our understanding that the California Building Standards Commission in 2005 voted to switch to IBC and IFC, but stay with the UPC and UMC. They also suggested the adoption of the IRC without its plumbing, mechanical and electrical provisions.

The action of the CBSC in 2005 was well thought out, and we suggest HCD and CSBC continue to operate in accordance with that directive.

CAL SMACNA represents over 625 HVAC Contractors Statewide.
CAL SMWIA represents over 25,000 HVAC technicians statewide.

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Name

Erik S Emblem

Name of organization (please include any acronym)

California Joint Committee on Energy and Environmental Policy
(JCEEP) Sponsored by CAL-SMACNA and CAL SMWIA

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> Speaking as a California home owner, a licensed CA plumbing contractor and current Combination Building Inspector (City of Oceanside) I do not see any benefit in adopting the IRC (CRC) in California. The reasons I strongly object are summarized in the following:

1. While an all-in one residential book may be convenient or cost-efficient for some users, it will be inconvenient and/or costly for plumbing and mechanical contractors who don't need to an all-in one book. Convenience for a small group of code-users is not a sufficient justification to include plumbing and mechanical chapters in a California Residential Code that are duplicative of what is currently in the California Plumbing, Electrical and Mechanical Codes.
2. Staying with the IAPMO codes for plumbing and mechanical provisions is preferable to the contractor community because these codes are developed using an ANSI certified process. This process gives all stakeholders a voice, including contractors, manufacturers and installers and ensures a much greater pool of expertise in the development of the codes. Moreover, under the ANSI process no one stakeholder group can dominate code development, ensuring consensus codes that best protect public health and safety.

-
3. On the contrary to the ANSI process, in the ICC based code development process, Building Officials, many without any significant understanding of plumbing, mechanical or electrical systems are more likely to develop codes with significant defects.
 4. The current 2006 IRC provides methods of installing DWV systems that do not provide the same level of protection/sanitation that the 2006 UPC does. Californians will not be pleased with DWV systems built to this lesser standard. For example, the IRC allows the use of side inlet quarter bends per P3005.1.3 , double sanitary tees as per P3005.1.1 & 2 , 1 percent slope for 3" and 4" drains per P3005.3 , and side wall termination of plumbing vents as per P3103.6 . Californians not accustomed to foul odors and increased maintenance problems in their homes will be truly displeased with the IRC provisions.
-

Section 2 Views Represent	Please answer the following before submitting your comments.		
	<input checked="" type="checkbox"/> Responses represent my views as an individual		
	<input type="checkbox"/> Responses represent a consensus of members of an organization I represent		
	Name		
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IRC-Electrical Section Comments:

- **Training programs:** Joint Apprentice Training Programs across California and the country are based on the NEC provisions and the NEC format. Introducing IRC electrical provisions means overhauling the newly instituted training program on the CEC. Electrical Inspectors also run through training programs on the CEC. This would demand a significant cost to develop additional training programs for reconstituted NEC provisions. This is a significant cost to the electrical industry, for no benefit.
- **The IRC electrical provisions are incomplete:** There are numerous examples of where the limited scope of the IRC makes it is necessary to refer to the NEC such as for electrical services rated more than 400 amperes, three-phase residential services, solar photovoltaic systems, several types of electric heating systems (e.g. radiant ceiling panels and cables) and large air-conditioning equipment just to name a few. These items are not uncommon in residential construction in many areas of the US thus it will require use of both the IRC and the NEC for installation and inspection of electrical systems in one-and-two-family construction. The entire NEC/CEC must be reviewed section by section to determine if it could be applicable to an IRC structure. Therefore, those plan checking, installing and inspecting will definitively need two books (IRC and CEC) rather than one.

Section 2

Views
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Name			
Steven Gutmann, Deputy Building Official			
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- Adoption of a residential code that includes plumbing code requirements that conflict with current California Plumbing Code creates potential negative impacts on home owners, builders, plumbers, inspectors and jurisdictions. Including:

➤ The two codes are developed by different code development organizations and on possibly different cycles. These separate paths of code development will lead to ever widening differences between the two plumbing codes adopted in the state.

The physics that dictate a safe plumbing system do not change with regard to commercial or residential work. It will be difficult to justify having a stricter standard for one type of occupancy verses the other. Accordingly, the California Plumbing Code has very little requirements that apply only to one occupancy or the other.

A great deal of time, testimony and input went into code development hearings that resulted in the adoption of the California Plumbing Code based on the Uniform Plumbing Code. Adopting a residential code that is based on another model code will leave stakeholders feeling disenfranchised and specific issues that were discussed at length will again be opened.

Extracting, by the code developers, of only specific language out of any model code will result in a California Code that is not based on a model code developed under any recognized standard. I am not aware of any code development standard that will allow ICC or IAPMO staff to pick and choose code sections in order to create a separate code.

Any residential code that includes plumbing and /or mechanical requirements should be based on the current California plumbing and mechanical codes regardless of which model code was used. The California plumbing and mechanical codes should be adopted into any residential code by reference. If it is desired to include only plumbing and mechanical code sections that apply to residential occupancies it should be done by HCD through its development process' and not by ICC or IAPMO staff.

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Currently there are a few reasonable options for the consideration of a residential code in California;

1) Have ICC and IAPMO work together to create a California Residential Code using excerpts from the IAPMO codes for the P & M issues. This could be the start of the merger that was previously considered and would be the best for all parties involved.

2) Adding IRC provisions to The California Building Code but do not include plumbing and mechanical items. Or similarly, adopt the IRC as a separate volume but do not include plumbing and mechanical items.

3) Adopt all the International Codes (easier said than done)

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International Residential Code Project:
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Department of Housing and Community Development

Division of Codes and Standards

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>

This comment is specific to Section R303 of the IRC. Since we are here in California enjoy long days of sunshine and fair weather, it is impractical and unhealthy to allow the Exceptions of Sec. R303, where the operable glazing or any glazing is not required in habitable rooms if mechanical ventilation and artificial light is provided.

These exceptions will encourage inadequate ventilation and lighting and create potential for mold and health hazard situations to the people living in these homes.

On the other hand, we are advocating the use of natural methods, energy saving and green buildings, hence it is essential to avoid the use of mechanical venting and artificial lighting particularly in single and two family homes.

I hope that this comment be considered in the process of adopting the IRC for California one and two family construction code.

Section 2

Views
Represent

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☐ Responses represent a consensus of members of an organization I represent

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Name of organization (please include any acronym)

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(Text area will accept any amount of text)

> As a Certified Building Official and Manager of the City of Oceanside Building Division, I strongly oppose the adoption of the international Residential Code in the State of California. This would include the provisions of the NEC contained therein.

- The State of California has currently adopted and amended the International Building Code. The IBC was not designed for one and two family dwellings. However, the IBC has been thoughtfully amended by the State of California to address some of those issues associated with the design and construction of one and two family dwellings. Yes, there are still some amendments needed. However, I am confident that the Building Standard Commission could address and continue to amend the IBC/CBC as needed, without adopting the IRC and adding confusion to those who use the code(s)
- While an all in one residential book may be handy, convenient or cost effective for some users, it will be inconvenient or costly for those who also do work in other occupancies not covered by the IRC. Convenience for a small group of code users is not a sufficient justification in my opinion, to publish the IRC in the State of California. The NEC does very well as a standalone document.
- Adopting the IRC would have a negative/financial impact on California Businesses and Building Divisions, because the code user would have to buy and be trained in an additional code book. It would be very difficult to increase any budget during an economical down turn, in order to purchase books and training for Building Divisions and businesses Statewide. The currently adopted California Building Codes works fine. There is no urgency to adopt the International Residential Code. We have a CEC, CMC, CPC, and CBC that works. Please move forward with these current codes and any required amendments.

Section 2

Views
Represent

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☐ Responses represent a consensus of members of an organization I represent

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>

It is in my opinion that the adoption of the IRC will benefit HCD, the designer, the home owner and the building inspector. Such a concise building safety handbook will not only complement the 2007 CBC, but it will also aid in designing. No longer would someone have to thumb through four exhaustive texts. Which in a large part are mostly commercially based? The residential code also makes for prescriptive designing. This will help aid in building safety and lower building costs. I have been certified as an IRC building inspector and I believe that this code will be an asset to the state.

Section 2

Views
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>

1. Attached garage separation from dwelling.
2. Section IRC R309.1, R309.1.1, R309.1.2, and R309.2 in comparison to CBC 406.1.4.
3. The language of the IRC sections are clear and precise while the CBC references to section 715.4.3. Also the IRC list the 26 gage requirement while the CBC does not.
4. The IRC references are easier for the builders and owners to understand. The inclusion of R309.1.2 regarding "Other Penetrations" makes the requirements much clearer and easier to understand.

Section 2

Views
Represent

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☒ Responses represent a consensus of members of an organization I represent

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916-880-5605

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>

1. General Comment for adoption of IRC.

2. Since it first became available in 1998, I have been utilizing the IRC as the textbook for my building code class on how to build a single family dwelling, which I have been teaching for the last 19 years. The IRC has been a much easier text to teach from and all of my students prefer it to the bits and pieces of the IBC (now CBC and formerly UBC) which are the adopted codes. Even though my classes do not deal with the electrical, mechanical, and plumbing portions of the IRC, clearly a one source reference pertaining to just the normal installation requirements for electrical, mechanical, and plumbing would be an invaluable tool to the smaller contractors, who are responsible for doing ALL the work on smaller dwellings and remodels.

3. The inclusion of the prescriptive methods for metal framing and basement walls allow cost savings for many homes. Hopefully these methods will remain in the IRC and not be amended out through our adoption process.

4. In my opinion and the opinions of my many students, the IRC is a much needed resource for the many residential builders, including owner-builders, which build the single family homes that are a significant portion of the construction industry. The IRC is a concise, inclusive, and stand alone resource which will significantly assist the many contractors and builders in the residential sector of the construction industry within the state of California.

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>

I have never seen the IRC code so wouldn't be able to comment intelligently. Mt only thought is "Why two Codes". The NEC has worked well for everyone so we don't need a second code with possible differences subject to field interpretations.

Section 2

Views
Represent

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- The primary issue of concern is the proposal of the electrical code that has at this time never been published.
- This is ridiculous since the National Electrical Code has been a proven code for many years and is revised every 3 years. How will this effect the state requirement that all electricians be certified? It will only add to confusion.

The most comprehensive rational or justification for I can provide is that the National Electrical Code is a proven code and to think that the IRC could any way replace is absurd.

Section 2

Views
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It is critical that we be able to provide the construction industry a single document that is all inclusive for the one and two family dwelling industry, as it is now this is 85% of the business that we do and most builders and trades people do not have codes because of the cost and inability to store all of the various volumes required to get the whole code. Many new contractors start out in this part of the industry and need a single book to work from that is complete and comprehensive anything other than this approach is being made from a self serving standpoint and is either trying to increase sales or maintain control, not serve our customers. Please do the right thing for the industry and for the people of California, provide us a single all inclusive code whether the plumbing and mechanical portions come from IAPMO or ICC the industry truly does not care, we and they want a single book. Thank you.

Section 2

Views
Represent

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☒ Responses represent a consensus of members of an organization I represent

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- 1) Section E3301.2 of the 2006 IRC limits the application of the IRC electrical provisions to one- and two-family residences with a serving voltage of 120/240 Volt 1 phase and not over 400 Ampere. Silicon Valley Power, the Municipal Utility serving the City of Santa Clara, provides a serving voltage of 120/208 Volt 1 phase for all new underground supplied one- and two-family homes. Therefore, the provisions for sizing of service entrance conductors are not accurate or acceptable within the City of Santa Clara.
- 2) The 2006 IRC does not include the provisions of CEC Article 225 Part II that addresses a second building or structure on the same property. This causes problems where a one- or two-family home has accessory structures, such as detached garages, storage sheds, or cabanas, which are provided with electrical power. CEC Article 225 Part II contains many provisions concern the number of feeders to the structure, the location of the structure's disconnecting means, number of disconnects allowed. Since many of these structures are included with standard home, this would require the residential contractor to have both books on hand.
- 3) The 2006 IRC does not contain the provisions of CEC Article 411 that address low-voltage luminaires. These type of luminaires are installed in the kitchens of many home and also within the landscaping areas. This is another example where a residential contractor would need both books to complete the installation.
- 4) These three examples indicate that the residential contractor and inspector would not be able to use a single code for the inspection of a "standard" one- and two-family dwelling. There are also numerous provisions in the CEC that are not addressed in the IRC that are becoming more common in "standard" one- and two-family dwellings, such as, solar photovoltaic systems or generator systems for back-up power. The electrical provisions of the 2006 IRC are excerpts of the 2007 CEC and constitute a redundant set of basic requirement in a different format. The electrical provisions of the IRC are not needed as the requirements are already covered by a current California Code and will provide confusion for installers and inspectors that are quoting different Section numbers for the same installation item. The confusion will result from the different wording used between the two Codes. I

understand the need for the structural provisions of the IRC but think that the adoption of the electrical provisions is neither necessary nor prudent.

Section 2
Views
Represent

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>

Rationale and justification for referencing the California Plumbing Code and California Mechanical Code for these provisions.

Lacks Justification / Unnecessary

- Justification for adopting IRC Chapters 1-10 is that IBC/CBC doesn't include all necessary residential provisions. Same justification does not apply to the plumbing and mechanical chapters because CPC and CMC contain all necessary residential provisions.
- While an all-in one residential book may be convenient or cost-efficient for a small group of code users, it will be inconvenient or costly for plumbing and mechanical stakeholders who don't need an all-in one book or who also do work in occupancies not covered by the IRC.

Confusing and Duplicative

- Including plumbing and mechanical chapters in a California Residential Code would result in code provisions that are either duplicative of California Plumbing and Mechanical Code provisions or potentially inconsistent with current California Codes.
- Line between residential plumbing and mechanical systems not always clear – e.g. live/work spaces – better to have all plumbing and mechanical provisions in one book.

Costly

- Plumbing and mechanical code users would have to buy and be trained in an additional codebook.
- This would represent an additional cost to local jurisdictions, plumbing and mechanical contractors, libraries and other stakeholders.
- Would require costly update to apprenticeship curriculums
- Cost unjustified given current budget crisis – any additional cost could result in layoffs and reduced resources for inspection.

Other States Adopt IRC without Plumbing and Mechanical Chapters

- This approach is proven in other states such as Nevada, which adopt the IRC without including plumbing and mechanical chapters.

Section 2 Views Represent	Please answer the following before submitting your comments.				
	xx Responses represent my views as an individual				
	<input type="checkbox"/> Responses represent a consensus of members of an organization I represent				
	Name				
	Phillip H Ribbs				
	Name of organization (please include any acronym)				
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>

I am a contractor in the State of California, license #555777. I actively install plumbing under the current California Plumbing and Mechanical codes. I am hands on, in the field, not a paid representative of anyone. My objection is of the general nature of the IRC. The current California Plumbing and Mechanical codes contain all of the provisions that are necessary for the installation of residential plumbing and mechanical systems. The adoption of the IRC for residential buildings sets the stage for a conflict between the two documents. The Current Plumbing and Mechanical codes are fully complete and integrated documents that have been reviewed and the conflicts minimized. They have been purchased and many plumbers and mechanical contractors and their employees trained in the provisions and changes that have taken place. To adopt the IRC would simply add another layer of cost for additional books and training with absolutely no benefit to contractors, the public at large or the State of California. As a contractor I find that keeping code requirements simple with a minimum of duplication and conflict results in the best product that I can produce.

I urge that the IRC not be adopted. If the IRC should be adopted then I would urge that the plumbing and mechanical codes be extracted from the current approved California codes so that conflicts be minimal and we, the contractors, are able to utilize the training and manuals that we have already expended time and money on learning. My view of the primary role of HCD is to promote the best housing product for our State. I feel that the current version of the IRC defeats this purpose. Arnold Rodio President Pace Setter Plumbing, Corp.

Section 2

Views
Represent

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☐ Responses represent a consensus of members of an organization I represent

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>

As a Mechanical Engineer and Journeyman Plumber in California, I am writing to express my opposition to HCD including Plumbing and Mechanical requirements in the proposed IRC. Currently the Residential Plumbing and Mechanical requirements are adequately covered by the UPC and UMC, and have been since California adopted the UPC and UMC as state code. Including Plumbing and Mechanical requirements in the IRC is unnecessary, duplicative and costly. Other states have adopted the IRC without including Plumbing and Mechanical, so can California. There is no justification of extracting Plumbing and Mechanical from the California codes to include them in the IRC. I therefore urge the HCD to adopt the IRC without Plumbing and Mechanical requirements, and leave the Plumbing and Mechanical in the UPC and UMC.

Thank you for consideration of this matter.

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>

The IRC was developed by NFPA for ICC for 1 & 2 Family Dwelling construction. It is a combination of four code books. The IRC utilizes selected parts of the NEC and limits the references to 120/240-volts, 3-wire, single-phase, and a maximum rating of 400-amperes. Outside feeders and branch-circuits, appliances, special equipment and equipment for general use are not adequately represented in the IRC. The IRC is too generic and perhaps contrary and convoluted for the user in comparison to the model codes. A trained inspector familiar with the various codes can assist contractors in code compliance. The unions and trade schools teach the National, Uniform and/or the International codes in an effort to coordinate educate and training of the trades personnel to maintain quality and consistency of installations. In my opinion, the IRC mitigates the established minimum standards in the model codes and I believe that to be substandard. Additional study and training would be needed to know what former minimum installation standards would not required for the construction to remain code compliant.

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>

I have several issues of concern. First is the layout of IRC Part VIII does not follow the same pattern of Articles as the NEC, so it is not user friendly to those familiar with the NEC. Second it will require the use of two electrical codes, to make correction notices, for Combination Inspectors, which most Jurisdictions employ. Third the limitations of the IRC also require the use of two code books to wire many types of single family homes.

IRC E3301.2 limits the voltage applied to these homes. "Services within the scope of this code shall be limited to 120/240-volt,)- to 400-ampere. There are many townhomes (single family dwellings) that are supplied with 208Y/120 volt systems which are not addressed in the IRC because of the voltage limitation. This again would require the use of two electrical codes if the IRC Part VIII is adopted.

IRC E3502.2 Service load, limits load calculations to Table E3502.2. NEC Article 220.82 allows the use of both 120/240-volt or 208Y120-volt in the calculations and allows for two methods of calculation. NEC 220.83 has methods of load calculations for an existing dwelling units.

These are two examples of what I see as deficiencies in IRC Part VIII. The required use of two electrical codes by inspectors, electricians, code instructors, students and designers seems to place an unneeded burden them.

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> Threshold Heights:

1. Sections IRC R311.4.3 and CBC 1008.1.6:
Threshold maximum height requirements are confusing within the CBC section. The maximum threshold height provision is clear within the IRC. (Becky)

The CBC sections are conflicting with each other, for example: CBC 1003.5 exp.1 with CBC 1008.1.6 exp. And CBC 1008.1.4 with CBC 1008.1.6. (Jerri)

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> Emergency Escape Windows:

1. Sections IRC R310.1 and CBC 1026.1:

Both sections require the yard or court in which windows access to provide direct access to the public way. This requirement is difficult to apply on interior zero lot line townhouse projects with fenced rear yards. (Becky)

In IRC R310.1 the beginning states that the windows access to a "public street, public alley, yard or court." It's only at the end of this section, as if added as an after-thought that the yard or court needs to provide direct access to the public way. And most of these townhouses will have residential fire sprinklers as well. (Jerri Borow)

2. Section R310.5:

This section allows emergency escape windows to open into a covered area, including under a deck. Rescue is difficult for emergency rescue personnel. Modifications to this provision need to be addressed through the national code development process. (Becky)

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> Clearances above grade for pressure treated wood

1. IRC section R319.1, item #2 specifies 8" from ground but item #5 specifies 6" from ground. Both applications would probably be on a PT sill (Jerri Borow)

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> Enclosures under stairways

1. CBC Section 1009.5.3 exception, allows protecting the underside of the stairways, in R2 and R3 occupancies with one layer of ½" gypsum board. It's not clear if the 1-hour fire-resistive rated construction is still required with only a reduction of the gypsum board covering. When searching the IRC for any clarification on this matter, I could not find any requirement for protecting the enclosed space at stairways. Am I missing something or is this not a requirement in the IRC, and/or should it be? (Jerri Borow)

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> Window Sills

1. IRC R613.2 and CBC 1405.12.2 differ in clarity. The CBC section is more concise and the IRC also has an additional exception. (Jerri Borow)
2. The differences in IRC and CBC are cosmetic. The IRC has Exception #1 that is contained within the main section language of the IRC and CBC-(Daniel Eitman)

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> Exterior Coverings – One Coat Stucco (Extruded and Expanded Polystyrene, Polyisocyanurate and other foam plastics)

1. CBC 2603.8 specifies a minimum clearance above grade for this product used in one-coat stucco systems but the IRC does not address this? (Jerri Borow)
2. IRC Section **R314.7 Termite Damage** references using the standard set in Section R320.4...which then leads to R320.5 with the clearances. (Daniel Eitman)

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> Party Walls

1. IRC section R317.2 and CBC section 705

IRC section R317.2 is dealing with townhouses and CBC section 705 is Firewalls which have taken the place of "area separation" walls. It is my understanding that the townhouse section in the CBC is 419.4 and that the wall assembly separating the dwelling units, which are lot line walls not party walls, and are to be treated as exterior walls, which the IRC clearly does. The specific requirements which are outlined in CBC section 419.4 are to be enforced. In comparing CBC section 419.4 with IRC section 317.2 they are pretty much the same. (Jerri Borow)

The IRC is clearer when it gets to the penetrations and duct /air transfer sections which are included within IRC 317 instead of the CBC which sends you all over the place 419.4 to 705.9 to 712 to 716.

I agree the IRC is clearer and Jerri's comments are better said than my initial ones (Daniel Eitman).

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> **Attic Ventilation:**

1. Sections IRC R806.2 and CBC 1203.2:

In the IRC it is confusing if the upper and lower apply for the basic 1/150 or if it is only for the alternative 1/300. The CBC is written clearer in this case.

However, my question is what happens at a roof (such as occurs over a garage or porch or bay window) that does not even reach 3'-0" in height? Another concern is that roof flashing would cover a lot of the vent. If it's in an area that has insulation and the plywood is 1" away from the top chord extending from the eave vent to the upper vent for maybe 2'-0"? The O'Hagin product would not be above the 3'-0" rule in these cases. On roofs less than 3' to 4' high it would create a lot of extra work and would make the houses much less attractive, creates flashing problems, and insulation problems. It seems to me that we should provide what can fit into the code's description of what upper ventilation is. If you don't have space above 3'-0", then you can't provide upper ventilation. (Jerri Borow)

I would add that the IRC wording of R806.2 is different than the CBC 1203.2. In the IRC, 1/300 may be applied in lieu of 1/150 if you choose the hi/low option or use the vapor barrier. In the CBC, hi/low is required no matter what for 1/150, and the 1/300 is only allowed if you use the vapor barrier. CBC does not provide for when hi/low cannot be achieved. (Dan Eitman)

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> **Fire Separation Distance:**

1. Sections IRC R302.1 and definition R202:

Under the definition of Fire Separation Distance it specifies that the distance shall be measured at right angles from the face of the wall. This has caused some real confusion in what is the "building face" by definition (which there is none). Does this include the finish materials such as stucco, siding, sheathing? Or does this go to the outside face of the exterior wall studs? (Jerri Borow)

The same issue exists under the IBC/CBC and ICC is reluctant to offer up an explanation as to what constitutes the "building face". (Dan Eitman)

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> Calculating Openings in Exterior Walls:

1. Sections IRC R302.1 and Table R302.1:

There should be a specific explanation on how to calculate openings in exterior walls when you have covered porches or decks in line with an exterior wall that is required to be fire protected due to location on property. Does the opening created by the covered porch (or similar area) get included with the 25% opening calculation? (Jerri Borow)

The same situation exists when dealing with the IBC/CBC. ICC continues to be divided on this item and reluctant to offer an official interpretation, leaving it up to each jurisdiction. (Dan Eitman)

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> Window Sills

IRC R613.2 and CBC 1405.12.2 differ in clarity. The measurement is stated as “the lowest part of the clear opening of the window...” in the IRC while the CBC states, “the opening of the sill portion...” What if the window only opens at the top? The CBC section is more concise. And the IRC also has an additional exception - “windows whose openings will not allow a 4-inch diameter sphere to pass through the opening when the opening is in it’s largest opened position.” (Jerri Borow)

IRC R613.2 is confusing with the inclusion of exception 1. Seems kind of redundant.
(Joe Martinez)

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> Appendix H – Patio Covers

1. Currently building departments are struggling with patio covers and how to address them. Appendix I in the CBC is not adopted by the CBSC. Appendix H of the IRC could help give clarification and a more prescriptive approach to these minor structures. The structural provisions would need revisions and clear thought to meet California seismic requirements. Due to the low cost of these structures, DIY's, Designers and Builders as well as Building Departments would benefit from prescriptive code requirements without paying for engineering that sometimes is more expensive than the materials themselves. In addition this gives clear direction to the light, ventilation and egress which can be problematic if not address in this manner. Of course, pre fabricated metal patio covers would still need engineering and analysis and design calculations to be submitted to the Building Department. (Will Crew)

Appendix H, Patio covers is identical to Appendix I in the IBC/CBC with the exception of Section AH107, (Special provisions for aluminum screen enclosures in hurricane prone regions), which do not apply to California. (Tom Oxley)

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> Fireblocking

1. IRC section R602.8 and CBC section 717.2.1, Allowable fire blocking materials are different in the two code sections. (Becky Fraser)

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> Guard Height

1. IRC Section R312.1 allows the guard height in residential to be 36 inches high. The CBC section 1013.2 requires the guard height to remain at 42 inches high. Section R312.1 within the IRC would require an amendment to keep the guard height at 42 inches. (Becky Fraser)

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> Protection against decay

1. CBC section 2304.11.2.2 and 2304.11.2.4 / IRC section R319.1

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> Stairway Width

1. IRC section R311.5.1 allows a stairway width to be 31.5 inches below the handrail. It may be reduced furthermore to a distance of 27 inches when two handrails are provided. These provisions are different than CBC requirements. The IRC language is clearly written for consistent application of the provisions. (Becky Fraser)

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> TABLE R302.1

1. Table R302.1 vs. CBC Table 704.8 footnote c:

Table R302.1 clearly identifies the requirements for opening protection when the structure has a fire separation distance of >3' to 5'.

The IRC allows 25% of the wall area in unprotected openings. CBC Table 704.8 footnote c has two major interpretations. The first is to allow 25% unprotected openings and the second is to allow 10% unprotected openings and 15% protected openings which total 25%.
(Becky Fraser)

2. Table R302.1 vs CBC Table 704.8 footnote i:

The placement of footnote i on Table 704.8 under columns with fire separation distances greater than 5 feet is confusing. The question many are trying to resolve is whether the footnote can be applied to residential non-rated walls with a fire separation distance of 5 feet. Table R302.1 clearly specifies requirements for unlimited unrated openings at 5 feet. (Becky Fraser)

3. Table R302.1 vs CBC 704.2:

Table R302.1 clearly identifies the distance and protection requirements for projections.

(Becky Fraser)

4. Table R302.1, general:

Table R302.1 is easier to understand and all inclusive. Exterior wall elements that require fire resistive ratings due to the fire separation distance are found collectively within the table. The provisions within the CBC are scattered within chapters 6 and 7. The IRC provisions are clearly written compared to CBC sections which use footnotes and amendments to identify residential provisions. (Becky Fraser)

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IRC R1003.9.1

Concern:

States" where a spark arrestor is installed"

Comment:

CBC states all chimneys that are attached to fireplaces that burn solid fuel shall have spark arrestors attached

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> IRC R905.2.8.2

Concern:

Metal Valley Flashing required to be 24" wide vs 16" for CBC

Comments:

This inconsistency occurs again @ 905.7.6, where it calls for a 10" from centerline and the CBC calls for an 11" from centerline. I think a 24" wide standard for all metal valley flashing would simplify matters.

Section 2

Views
Represent

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> IRC 703.6.2.1

Concern:

Weep screed material allows plastic in addition to corrosion resistant metal

Comments:

Would like to hear from others, I have yet to see this product

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> Appendix E – Manufactured Housing

1. IRC Appendix E addresses provision which are contained in Title 25 and would not apply to one and two dwellings constructed under Title 24 within California. (Becky Fraser)
2. IRC Appendix E addresses provision which are contained in Title 25 and would not apply to one and two dwellings constructed under Title 24 within California. (Becky Fraser)
3. I believe that Title 25 would supersede this Appendix, so I do not it would need to be adopted. (Dan Kavarian)

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> Appendix G – Swimming Pools

1. IRC Appendix G addresses provisions which are contained in Health and Safety Code known as the Swimming Pool Act which takes precedence. (Becky Fraser)

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> Appendix L Permit Fees:

1. IRC Appendix L addresses permit fees which is addressed at a local level. (Becky Fraser)

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>

Chapter 11 Energy:

1. It would benefit the residential building industry if residential energy prescriptive regulations were incorporated into Chapter 11 of the IRC. This would provide the industry with a truly comprehensive and complete document for residential one and two family construction.
(Becky Fraser)

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>

General Overview:

1. The IRC, inclusive with mechanical, electrical and plumbing provisions would benefit the local enforcement agencies, designers and builders by providing a complete document for residential provisions. An all inclusive code book would provide easy in training residential inspection staff. Residential designers and builders would be able to purchase one documents for all provisions related to residential construction. (Becky Fraser)
2. Adoption of the IRC would provide consistency across the nation for residential standards. (Becky Fraser)
3. The IRC provisions are straight forward in comparison to the current CBC. Many confusing sections of the CBC, which cause inconsistent interpretations, are clear and concise within the IRC. (Becky Fraser)
4. Residential construction standards would be modified through the code development process at the national level. (Becky Fraser)
5. Continuous amendment to the CBC based on the IBC for residential provisions would be difficult and time consuming in comparison to updating the amendments to the IRC. (Becky Fraser)

6. As a Certified Building Official, and Manager of the City of Oceanside building inspections division, I strongly oppose the adoption of the International Residential Code in the State of California. Some of the reasons are as followed:

- Adopting the IRC would have a negative impact on California businesses and building departments because the code users would have to buy and be trained in an additional code book. It would be very difficult to increase the budget during an economical down turn, to purchase books and training for building departments and businesses state wide. However, the cost is not my only reason.
- The State of California has currently adopted and amended the International Building Code. This code was not designed for one and two family dwellings. However, the IBC has been amended by the state to address some of those issues. Yes, there are still some cliche amendments needed. However, I believe the Building Standard Commission could address and continue to amend the IBC/CBC as needed.

While an all in one residential book may be convenient or cost effective for some users, it will be inconvenient or costly for those who also do work in other occupancies not covered by the IRC.

7. CBIA strongly supports California's adoption of the IRC as the residential companion document to California's adoption of the IBC. And while we support the adoption of the IRC with as few state amendments as possible, we recognize that this is the State of California, and California has always lead the nation in amendments.... to everything. Our first goal is to see the IRC brought into the California State Code along with the other codes during the 2010 Update. (Bob Raymer)
8. The idea that we could have one code book (excluding the energy code) for one and two family homes would make an inspector think they died and went to heaven. The IRC is not perfect but it is a better code for residential than the CBC right now. We can work with this code and have a better product. One example would be the difference between Table R302.1 and Table 704.8, one is clear and one is confusing. I would encourage its adoption. (Dan Kavarian)
-

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>

1. General Comment for adoption of IRC.

2. Since it first became available in 1998, I have been utilizing the IRC as the textbook for my building code class on how to build a single family dwelling, which I have been teaching for the last 19 years. The IRC has been a much easier text to teach from and all of my students prefer it to the bits and pieces of the IBC (now CBC and formerly UBC) which are the adopted codes. Even though my classes do not deal with the electrical, mechanical, and plumbing portions of the IRC, clearly a one source reference pertaining to just the normal installation requirements for electrical, mechanical, and plumbing would be an invaluable tool to the smaller contractors, who are responsible for doing ALL the work on smaller dwellings and remodels.

3. The inclusion of the prescriptive methods for metal framing and basement walls allow cost savings for many homes. Hopefully these methods will remain in the IRC and not be amended out through our adoption process.

4. In my opinion and the opinions of my many students, the IRC is a much needed resource for the many residential builders, including owner-builders, which build the single family homes that are a significant portion of the construction industry. The IRC is a concise, inclusive, and stand alone resource which will significantly assist the many contractors and builders in the residential sector of the construction industry within the state of California.

Mike Langford

General Overview of Plumbing, Mechanical, and Electrical provisions:

Chapter 26 General Plumbing Requirements: P2601.1 Scope states "The installation of plumbing, appliances, equipment, and systems not addressed by this code shall comply with the applicable provisions of the INTERNATIONAL PLUMBING CODE." The CPC is based on the Uniform Plumbing Code by IAPMO.

Chapter 24 Excerpted from the International Fuel Gas Code which is not adopted by Ca.

Chapter 25 Water Heaters: M2005 Water Heaters- I find no requirement for the installation of a temperature/pressure relief valve and piping on a water heater that is found in the CPC.

Chapter 28 again labeled "Water Heaters" there is another chapter on Water Heaters. Kind of confusing.

Chapter 33-Electrical based on the 2005 NEC. (adopted as the CEC)

Since the CPC, CMC, and CEC are already adopted and used by jurisdictions throughout the state, why include the plumbing, mechanical, and electrical provisions when most staff are already familiar with these codes and their application to dwellings?

Joe Martinez

Section 2

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- 1) > **Requirements for Design Professionals:** Nine Point Criteria 1 and 6: HCD should ensure that its proposed CRC does not conflict with statutory restrictions on building design that require architects or engineers, and so that the CRC is not unnecessarily ambiguous or vague. HCD should consider incorporating Business and Professions Code Section 5537 in sections R102.2 "Other Laws" and R301.1.3 "Engineered Design." HCD should work with CALBO, CAB and BOPELS to develop amendments that clearly define the limitations of nonprofessionals designing dwellings and townhouses in CA and define the limitations of design professionals using the rules of the IRC in circumstances where they may not strictly comply with Section 5537 and the CBC for buildings requiring design by professionals. HCD should amend R301.1.3 to require engineering practice to mean compliance with the IBC consistent with CBC 2308.1.1. Section 5537 of the Business and Professions Code is as follows:

Section 5537 Business and Professions Code. (a) This chapter does not prohibit any person from preparing

plans, drawings, or specifications for any of the following:

(1) Single-family dwellings of woodframe construction not more than two stories and basement in height.

(2) Multiple dwellings containing no more than four dwelling units of woodframe construction not more than two stories and basement in height. However, this paragraph shall not be construed as allowing an unlicensed person to design multiple clusters of up to four dwelling units each to form apartment or condominium complexes where

the total exceeds four units on any lawfully divided lot.

(3) Garages or other structures appurtenant to buildings described under subdivision (a), of woodframe construction not more than two stories and basement in height.

(4) Agricultural and ranch buildings of woodframe construction, unless the building official having jurisdiction deems that an undue risk to the public health, safety, or welfare is involved.

(b) If any portion of any structure exempted by this section deviates from substantial compliance with conventional framing requirements for woodframe construction found in the most recent edition of Title 24 of the California **Code** of Regulations or tables of limitation for woodframe construction, as defined by the applicable building **code** duly adopted by the local jurisdiction or the state, the building official having jurisdiction shall require the preparation of plans, drawings, specifications, or calculations for that portion by, or under the responsible control of, a licensed **architect** or registered engineer. The documents for that portion shall bear the stamp and signature of the licensee who is responsible for their preparation. Substantial compliance for purposes of this section is not intended to restrict the ability of the building officials to approve plans pursuant to existing law and is only intended to clarify the intent of Chapter 405 of the Statutes of 1985.

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- 1) Documentation for Non-wood Structural Systems:** Nine Point Criteria 1 and 4: HCD needs to determine if IRC structural provisions do not conflict with IBC requirements for dwellings for which designs are required by architects or engineers in CA in accordance with the CBC. In response HCD should ask stakeholders with interests in structural systems including masonry, concrete, ICF, SIP, and cold-formed steel to submit documentation that include cyclic test results for the strengths and stiffness of individual components, their interactions and performance as part of building systems. The documentation will allow HCD and the public to identify conflicts by comparing other systems with similar documentation compiled by ICC's Ad Hoc Committee on conventional wood frame construction for wind loads, vertical loads, and seismic forces that was generated as a basis for recent code changes.

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- 1) **In-house HCD Design Professionals:** Nine Point Criteria 3: It is in the public's interest for HCD to obtain professional advice from a consulting or staff licensed architect or engineer when developing its amendments. HCD should not rely solely on the volunteer efforts of Committee members. By doing so, HCD will take professional responsibility for the structural adequacy of its regulations. Without design professionals on staff, it is less likely that all considerations of the public's safety can be addressed effectively when adopting the IRC with state amendments.

Section 2

Views
Represent

Please answer the following before submitting your comments.

☒ Responses represent my views as an individual

☐ Responses represent a consensus of members of an organization I represent

Name

Fred Turner

Name of organization (please include any acronym)

Structural Working Group

1755 Creekside Oaks Dr. #100 Sacramento, CA 95833

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To Contact HCD

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E-mail: ircproject@hcd.ca.gov

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<http://www.hcd.ca.gov/codes/shl/>

International Residential Code Project:
<http://www.hcd.ca.gov/codes/shl/residentialcodeproj.html>

Department of Housing and Community Development

Division of Codes and Standards

International Residential Code Project

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Section 1 Stakeholder Recommends

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- 2. Incorporate all appropriate IRC section numbers.**
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- 1) Unreinforced Masonry:** Nine Point Criteria 1, 3, 7A: HCD should address the state's goals regarding URM construction as it relates to chimneys in IRC Chapter 10 and crawl space and basement walls. CALBO's recommended amendments to IBC Sections 2111 for SDC C and D that are available at http://www.calbo.org/build_dept/seismic/seismic.aspx should be considered for statewide adoption. While many of these have been successfully incorporated into the 2009 IBC, for consistency and in the public's interest they should be included in the CRC requirements for conventional wood frame dwellings and townhouses. HCD should prohibit URM wall construction statewide consistent with Title 24, Part 10, California Existing Building Code and Health and Safety Sections 17040, 17921, 17922, and 19990.

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Division of Codes and Standards

International Residential Code Project

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- 1) **Dwellings in Moderate Seismic Regions:** Nine Point Criteria 1, 3, and 4: HCD should consider amending the exception in R301.2.2 "Seismic Provisions" to require dwellings in SDC C to comply with seismic requirements, including wood frame conventional construction and particularly for non-wood structural systems such as concrete, masonry, SIP, steel, and ICF to ensure a life safety performance objective. Amendments recommended by CALBO at http://www.calbo.org/build_dept/seismic/seismic.aspx for SDC C conventional wood frame construction should be considered for statewide adoption. HCD should develop and adopt amendments elsewhere in the IRC to carry this out consistent with the documentation described in Item 2 above.

Section 2

Views
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Name

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Department of Housing and Community Development

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> Appendix K:

1. Appendix K – There is a different standard for air-borne sound insulation and structural-borne sound insulation in the 2006 IRC than what is currently required in the 2007 CBC
2. 2006 IRC Section AK102.1 requires a minimum of **STC 45** when tested in accordance with ASTM E90; 2006 IRC Section AK103.1 requires a minimum of **IIC 45** when tested in accordance with ASTM E 492
3. 2007 CBC Section 1207.7 states an **STC 50** based on laboratory tests as defined in ASTM E90 and E 413, and a NIC 45 and NINIC of 45; 2007 CBC Section 1207.8 states an **IIC 50** based on laboratory tests as defined in ASTM E 492 and E989, and a FIIC of 45
4. Appendix K should be amended to reflect the current minimum sound insulation and impact insulation requirements of the 2007 CBC

Section 2

Views
Represent

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☐ Responses represent a consensus of members of an organization I represent *

*Comments include all responses from Stakeholders General Group IRC project

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Department of Housing and Community Development Division of Codes and Standards

International Residential Code Project

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- **IRC-Electrical Section Comment:**
- **While it is true that adoption of the 2009 IRC with electrical provisions will result in the IRC and California Electrical Code being based on the same model code, the National Electrical Code, at the time of adoption, probably in 2010, it must be noted that the 2011 NEC will be published and available to the public in September 2010. The electrical industry in California has stated its preference to adopt the most recent edition of the NEC as soon as possible. With the following edition of the IRC probably not adopted until sometime in 2013, that will leave California with only two options: delay adoption of the latest edition of the NEC for two years or expend the resources in time, energy, and dollars to revise the IRC electrical chapters to be compatible with the CEC, which would be based on the 2011 NEC.**
- **The citizens of California deserve the latest technology in life and fire safety that is incorporated into each new edition of the National Electrical Code. With this in mind for future adoptions, the only course of action that makes sense is to delete the electrical chapters of the IRC and use the same code, the CEC, for all dwelling electrical installations. Please take the best course of action for California and its residents and delete the electrical requirements of the IRC.**

Section 2

Views
Represent

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☒ Responses represent a consensus of members of an organization I represent

Name

Joe Andre

Name of organization (please include any acronym)

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April 21, 2008

Mr. Ray Bizal
Chair, Electrical Sections
California IRC Study Group

Dear Mr. Bizal,

Thank you, and the Department of Housing and Community Development, for offering NEMA the opportunity to participate in the decision making process regarding adoption of the 2006 International Residential Code. As you are aware, NEMA, the National Electrical Manufacturers Association, represents some 450 producers of electrical equipment in the United States.

The member companies of NEMA believe that the State of California will best be served by deleting Chapters 33 through 42 of the IRC. We recognize that these chapters in the IRC are based on the residential requirements found in the NFPA 70, The National Electrical Code. There are, however, areas of concern regarding resources, consistency and applicability that could make adoption and enforcement of the IRC problematic for the electrical industry in California:

1. The IRC is published on a different schedule than the NEC, lagging some two years behind the most recent edition of NFPA 70. For example, the 2006 IRC contains electrical requirements based on the 2005 NEC, even though the 2008 NEC is being adopted and enforced in many parts of the country. The IRC will not "catch up" with the NEC until the 2009 Edition. This often results in requirements for one and two-family dwellings being different from those requirements for multi-family construction. Every dwelling should have the safety benefits of new technology and information incorporated into the latest edition of the National Electrical Code.
2. Revising the IRC Electrical Chapters to conform to the requirements of the California Electrical Code, while possible, will require the unnecessary expenditure of resources in both time and money. There already is a workable electrical code in place in California that has been reviewed by all interested parties., the California Electrical Code, that has proven to be suitable for decades.
3. While the IRC is adequate for most house construction, it does not fully cover all the requirements necessary to safely install the electrical system in larger, complex homes. One example is that Table E3503.1 gives requirements for service conductor and grounding electrode conductor sizing, but includes services rated only to 400 Amperes. Probably more than any other state, California has homes with electrical service requirements far exceeding the scope of this table.

It is evident that, while the electrical provisions of the IRC could be made suitable for use in California, this approach is not practical or desirable because of consistency, adequacy, and effort. Please consider these comments when reviewing the electrical safety requirements for homes under the jurisdiction of HCD.

Should you have questions on the points raised here, or if NEMA might be of assistance in any other way during this review, please do not hesitate to contact me.

Regards
Joe Andre

National Electrical
Manufacturers Association

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Western Field Office
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Department of Housing and Community Development Division of Codes and Standards

International Residential Code Project

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Section 1 Stakeholder Recommends

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>

The National Fire Protection Association (NFPA) is opposed to the adoption of the electrical portion of the International Residential Code (IRC). NFPA urges the Department of Housing and Community Development to delete the electrical provisions in the IRC, and instead, reference the California Electrical Code (CEC) for regulations pertaining to electrical installations.

California statute already requires the adoption of the National Electrical Code (NEC) as the California Electrical Code (CEC) for all occupancies. Adoption of the electrical portion of the International Residential Code (IRC) would be redundant, costly and confusing.

Reasons for this position are based on the 9 point criteria established in the Health & Safety Code section 18930.

Criteria (1) states: *“proposed building standards do not conflict with, overlap, or duplicate other building standards.”* The IRC electrical chapters are a duplication of some of the requirements found in the California Electrical Code. The requirements, though not necessarily word for word, are all found in some fashion within the existing CEC. As such, the IRC electrical regulations duplicate the CEC regulations. This also creates conflict with the CEC since the IRC provisions are incomplete. This raises the question of whether the applicable provisions of the CEC apply if they are not found in the IRC.

Criteria (3) states: *“The public interest requires the adoption of the building standards.”* In this case, public interest does not require the adoption of the IRC electrical provisions. In fact, in light of criteria (1), public interest suggests not adopting the electrical portion of the IRC. The electrical industry, including electrical inspectors, seem to have an interest in keeping the electrical provisions in one code book, the CEC.

Criteria (4) states: *“The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.”* Since the IRC electrical provisions are incomplete for occupancies described by the IRC, they are arbitrary regarding enforcement for those occupancies. Fixing this, in order to achieve a single book for residential occupancies, would take an unreasonable amount of effort.

Criteria (5) states: *“The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.”* The cost to the public is **not** reasonable for the adoption of the electrical portion of the IRC for the following reasons:

- a) There is no benefit to public safety for adopting the IRC electrical chapters,
- b) The requirements are duplicative and redundant,
- c) To complete the electrical portion of the IRC requires a complete and unnecessary review of the NEC and CEC to incorporate all of the applicable provisions. This will cost the state money and time for no reason but to add duplicative additional provisions from the NEC and CEC,
- d) Segregating the electrical provisions into two books will cost money and time to unnecessarily revise the CEC to exclude the occupancies to be addressed by the IRC,
- e) Creating an additional code book for electrical installations will cost the electrical industry, including electrical inspectors, because they will have to purchase additional code books, and likely additional supplemental information.
- f) Creating an additional code book for electrical installations will cost the electrical industry, including electrical inspectors, because they will have to purchase additional training for the additional code books.

Criteria (6) states: *“The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.”* The IRC electrical provisions are ambiguous because they are incomplete and call to question whether other provisions in the CEC remain applicable. This is confusing because the CEC is already adopted and applicable to IRC occupancies. This will result in non-complying installations and misguided plan review and inspection, all at the cost of public safety.

Criteria (8) states: *“The format of the proposed building standards is consistent with that adopted by the commission.”* The format of the IRC electrical provisions are not consistent with the format used in CEC. The IRC is not the CEC, especially by format.

Again, referencing the CEC for regulations pertaining to electrical installations, instead of adopting the electrical provisions in the IRC will save time and money and provide for better regulation.

Section 2

Views
Represent

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☐ Responses represent a consensus of members of an organization I represent

Name

Raymond B. Bizal, PE

Name of organization (please include any acronym)

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National Fire Protection Association

West Coast Regional Office, 6285 E. Spring Street, Suite 363, Long Beach, CA 90808-4000 USA
Phone: 562-497-1706 • Fax: 562-497-1716 • www.nfpa.org

March 5, 2008

Peter Solomon
Manager, Housing Standards Program
Housing and Community Development
1800 Third Street
MS 260
Sacramento, CA 95811

Dear Mr. Solomon,

I am writing to provide comment to the focus group which is meeting to consider the adoption of the International Residential Code (IRC). The National Fire Protection Association (NFPA) is opposed to the adoption of the electrical portion of the IRC.

The electrical portion of the IRC is not the same as the National Electrical Code (NEC) or the California Electrical Code (CEC). The NEC provides the electrical regulations for California as established in statute, for all occupancies. Introducing electrical provisions in the IRC is unnecessary, redundant, confusing and expensive.

The state agencies responsible for electrical standards have already taken the time and effort to adopt the NEC and develop technical amendments for California as published in the CEC. And the CEC applies to all occupancies. Repeating this exercise for the electrical portion of the IRC would be duplicative and an unnecessary use of tax dollars. Doing so would require additional re-scoping and amending of the adopted CEC, as well as detailed review and amendment to the electrical portion of the IRC.

Adopting the electrical portion of the IRC will create confusion for those using and enforcing the CEC. The electrical industry and code enforcement officials use the CEC for all occupancies. Industry technicians and code enforcers are trained in CEC provisions, and they are familiar with the CEC text and format. The electrical provisions in the IRC are reorganized, renumbered and rewritten to fit the IRC, a format which is foreign to the electrical industry.

Further confusion occurs because the IRC utilizes only a portion of the NEC provisions applicable to one- and two-family dwellings and townhouses, and thus the IRC does not contain all the necessary provisions for one- and two-family dwellings and townhouses provided in the CEC. Adding to the confusion is the fact that the IRC does not contain any of the California amendments contained in the CEC that apply to these dwellings. This will cause confusion in the electrical industry and code enforcement community.

Peter Solomon
March 5, 2008
Page 2

Most importantly, the electrical provisions of the IRC are incomplete. As indicated above, the IRC does not contain all the provisions in the NEC that apply to these residential occupancies, and the IRC does not cover any California amendments contained within the CEC. Adopting the IRC electrical provisions increases the risk of electrical systems to be in noncompliance with the CEC, and create substandard housing. This will increase the risk of fire, injury and potentially life loss to the citizens of California.

Adopting the electrical portion of the IRC offers no advantages to the electrical industry, the building industry or the citizens of California. We urge you to **exclude** the electrical portion of the IRC, if adopted. Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Bizal', followed by a large, stylized circular flourish.

Raymond B. Bizal, PE
Western Regional Manager

Department of Housing and Community Development

Division of Codes and Standards

International Residential Code Project

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Please see attached letter from International Code Council

Section 2

Views
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Name

Jay Peters, Executive Director

Name of organization (please include any acronym)

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**HCD Request for Comment
Plumbing, Mechanical and Fuel Gas Provisions
International Code Council**

PREFACE:

The adoption of a residential code for construction in California is a great step forward. The IRC is founded on broad-based principles that make possible the use of the latest material technologies and building designs yet holds minimum public safety at the forefront. It has been processed through several code cycles thus far and received great input from diverse interests nationwide.

Because the IRC is adopted at the state or local level in 46 states, it has proven to accomplish the goals originally set forth; to establish provisions consistent with the scope of a residential code that protects public health, safety and welfare; provisions that do not necessarily increase construction costs; provisions that do not restrict the use of new materials, products or methods of construction; and provisions that do not give preferential treatment to particular types or classes of materials, products or methods of construction.

It is a complete and holistic approach to the design and construction of safe, affordable, residential housing and is a “whole” document. All provisions for building, plumbing, mechanical gas, energy and electrical are scrutinized, harmonized and correlated.

CORRELATION: The task of correlating thousands of uncoordinated critical life-safety sections within the 288 pages¹ of staff-selected plumbing, mechanical and fuel gas provisions with the, approximately 625² pages of the International Residential Code requirements is, by far, where resources of time and people will be challenged. In most cases (maybe all), code development cycles of model code organizations (IAPMO, ICC, NFPA) are a three-year nonstop system monitored and worked on by many people. During that time, every word of each section is scrutinized not only by interested stakeholders, but the proponent and opponent of each proposal. This is because they want to be assured the text reflects their intent. It is then, at least in the ICC process, reviewed by the Code Correlation Committee for ambiguity or lack of technical clarity.

Even when the process of meticulous correlation is completed per time-proven methods by staff members experienced in such procedures, issues undoubtedly arise. The 2007 CPC is but one example³.

Code correlation is not just about proper numeration of sections. Consideration must be given to the inter-relationship between technical safety provisions. This sounds simple yet each section of code is reliant on the other to have a holistic effect on the safety of its own provision. Although it seems practical to “drop in” or “substitute” the current IRC terms with the IAPMO staff-selected definitions as is suggested, it is very complicated. It will waste not only immense staff resources but it will cause major conflicts and serious safety concerns upon completion. The following is but two examples of “just replacing the IRC definitions with the IAPMO definitions”. Note: It was stated by IAPMO staff at the HCD meeting there were six versions of this residential code insert and that the one provided at that meeting should be used. The examples are based on that insert.

¹ Page count per submitted documents. It will most likely increase to approximately 300 pages after the missing mechanical code mandatory standards are added to the inserts

² Approximate pages contained in 2006 *International Residential Code*®

³ The 2007 CPC has been enforced for approximately four months and has 51 pages of errata thus far.

CORRELATION EXAMPLE 1: Replace IRC definition of “*combustible material*” (Section R202) with IAPMO staff-selected insert definition of “*combustible material*” (Section 1502.0). NOTE: This definition is located in approximately 27 locations throughout critical areas of the International Residential Code.

IRC - COMBUSTIBLE MATERIAL. Any material not defined as noncombustible.

IRC - NONCOMBUSTIBLE MATERIAL. Materials that pass the test procedure for defining noncombustibility of elementary materials set forth in ASTM E 136.

IAPMO UMC Insert - COMBUSTIBLE MATERIAL – Material subject to an increase in combustibility or flame-spread rating beyond the limits established in the definition of Limited-Combustible Material.

NOTE: There is no definition of “Limited-Combustible Material” within the submitted inserts. The definition of *Combustible Material* therefore has no meaning yet the term is referenced throughout the submitted insert in approximately 120 locations and especially when prescribing minimum clearances from heat producing appliances to building elements for fire safety. If this inserted text were to replace the IRC definition, it would cause major fire safety concerns.

It can’t be simply removed from the IAPMO submittal and replaced by the IRC version as it has a different meaning in the IAPMO code and will change the intent of its 120 life-safety provisions.

CORRELATION EXAMPLE 2: Replace IRC definition of “*closet*” with IAPMO staff-selected mechanical insert definition of “*closet*”.

IRC - CLOSET. A small room or chamber used for storage.

IAPMO UMC INSERT - CLOSET - See *Confined Space*.

IAPMO UMC INSERT - CONFINED SPACE – A room or space having a volume less than fifty (50) cubic feet per 1000 Btu/h (293W) of the aggregate input rating of all fuel burning appliances located in that space.

These definitions have two (2) distinctly different meanings. Both are critical to proper code interpretation. A *confined space* is critical in calculating combustion air requirements and may have life or death ramifications if not correctly calculated to provide air for proper fuel combustion, draft-hood dilution and ventilation of the equipment enclosure for fuel burning appliances.

A search must be performed for each and every occurrence of the term “closet” within the IRC. In this case, a search exposes that it appears approximately one hundred twenty six (126) times throughout the IRC. Not only does each and every occurrence of the word closet need to be located, it must be analyzed for technical relativity to that code section to see if it is in reference to a storage type closet or a fuel burning appliance compartment. After it is analyzed, the code must again be searched to expose any other sections that, although may not make mention of the word “closet” but just reference this section of the code within its provisions. If it is just replaced with the IAPMO suggested term, there will be major ramifications.

One solution offered may be to replace the IAPMO term “closet” or eliminate it from the definitions within the IAPMO provisions since “Confined Space” is already defined and therefore the word “closet” is not necessary. A search for the word closet would have to be done throughout the entire IAPMO document to see if it can be eliminated without ramifications to the intent of the IAPMO provisions. A brief search shows that it is located within the staff-selected inserts approximately 8 times just in chapter 14 (chapter 9 of the UMC).

Example continued'

It is obvious after analyzing just two locations, that the meaning of the word closet is used inconsistently within the code. They must now be scrutinized closely as one location, section 1403.0, uses the term in reference to the confined space definition yet section 1410.11 uses it as defined within the meaning in the IRC. It is complicated, time consuming and fallible.

It could take one person all day to work on this one instance or term and even then, they must be extremely well versed in the meaning of the text and the intent of the provision in each code to make a solid and safe judgment.

Correlation Conclusion: The above examples were but two (2) sections. There are thousands to consider. This may be too monumental of a task to expect anyone to perform in such a short time frame and may be not accomplishable at all due to the differences in code language, meanings, and intent throughout. Mistakes could be costly and possibly deadly. This is the reason model code development cycles are characteristically 3 years in the making. Both numerical coordination and technical correlation are required. They are not one in the same.

STANDARDS: When standards are referenced within codes, they become part of the code requirements and are mandatory in nature. Both the International Residential Code and the IAPMO staff-selected inserts refer the user to many mandatory standards for materials and the installation of such materials and systems. Although there is some overlap, there are many differences between them. The biggest difference is the total number of standards referenced in each.

The IAPMO staff-selected inserts reference more than five hundred (500) separate standards documents. It is hard to tell how many exactly as the mechanical standards were not included in the hand-outs to HCD. The total was calculated by adding all of the plumbing with the UMC standards. There are approximately 175 UMC standards.

The IRC plumbing, mechanical and fuel gas provisions currently reference approximately 195 total standards. That is a difference of almost 300 additional standards referenced within the IAPMO proposed inserts. If the proposed IAPMO standards were substituted for the IRC standards, the entire IRC table of over 600 standards would have to be reviewed and each standard analyzed to find where it is referenced and decided if it is feasible to remove. Many standards included within the IRC are located within different sections covering dissimilar installations or subjects.

Standards Example: Standard UL 1482 is referenced within chapter M14 at section M1410.1. for Vented Room Heaters within the IRC. This chapter is proposed to be removed using the IAPMO staff-selected inserts. If the correlating standard is also removed from the code to replace it with the corresponding IAPMO standard, it will cause a serious issue because the same standard is addressed in Section R1002.2 (1) Masonry Heaters of the IRC. This chapter covers chimneys and fireplaces and is not one of the proposed chapters for replacement. So, every location that a standard is proposed to be brought into the code from the IAPMO proposed inserts would have to be verified for compliance with current standards located throughout the IRC and found throughout the code to decide whether there is a corresponding requirement.

This would need to be done for the proposed 500 IAPMO staff-selected standards and the over 600 IRC standards. Over 1000 standards would have to be coordinated and correlated throughout the IRC.

CONCLUSION:

The above sections are only 2 code correlation examples and a small part of the total that are present throughout the document and just a sample of what can happen when a code is divided and utilized in part. It is the sum of all parts that make a safety code for construction a complete and protective document. The Uniform Plumbing and Mechanical Codes are protective and worthy codes when the requirements are adopted and enforced with the entire document in tact and as a whole. As soon as a code is parceled down and dissected to meet a different scope than originally intended, it is no longer the same safe standard and many of the puzzle pieces (code sections) will no longer fit. The layers of protection that are added over long periods of time, filling voids of safety, after many code cycles are no longer in place and holes in the protection materialize.

When the water heater chapter, for example, is pared down by 65 pages, there must be something wrong with the original code or the new proposed code. When there is no due deliberative process, stakeholders are not involved and the layers of oversight are removed, a myopically scoped code is inevitably the end result.

HCD's staff will waste vast amounts of time and resources when having to coordinate and correlate every section (not just PMG provisions) and standards in the code, especially when the IRC provisions have already been developed and scrutinized through a vigorous process. Risks will be taken as staff will have to make important judgment calls on technical issues. More financial resources will be wasted as HCD staff will have to monitor not only the IRC process for all other residential provisions but the UPC and the UMC development process for new code changes. If not, reliance will have to be put upon IAPMO to select which provisions should be selected for HCD's review and inclusion as a "residential" provision.

The Residential Construction Industry must be involved in the development of any residential code if it is to be a viable, modern and safe code. The input of the stakeholders is crucial if the state of California desires a code that protects public health, safety and welfare, keeps construction costs in check, doesn't restrict the use of new materials, products and methods of construction and stimulates the residential housing and construction economy.

The code for California should be tried and tested. The provisions of the IRC have passed this test on a national level and will not take any coordination and correlation. The Residential Plumbing, Mechanical and Fuel Gas committees and stakeholders along with the building community have already done so and the Code Correlation Committee assures it.

Department of Housing and Community Development

Division of Codes and Standards

International Residential Code Project

Stakeholder Comment Form

Use the TAB key to move from question to question. The form will accept input in the shaded areas only.

- Shaded boxes can be filled by clicking the mouse button or hitting the space bar.
- Shaded text areas (indicated by >) will accept any amount of text in the full MS Word editing environment. To move from a text input area, use your mouse.

When finished:

- Save this file to your computer for your records.
- Send to HCD by email or fax.
- Submit any additional supporting information or documentation by email or fax with this form.

Submit to the email or fax number at the end of this form. Please be sure to include a cover sheet identifying the purpose of your fax and send Attn: IRC Project.

Section 1 Stakeholder Recommends

1. Summarize issues of concern. 2. Incorporate all appropriate IRC section numbers. 3. In addition, include the necessary section numbers when utilizing the 2007 California Building Standards Code, Title 24, as a cross-reference or comparison document. 4. Please be specific and provide a comprehensive rationale or justification for any recommendation or suggestion offered.

(Text area will accept any amount of text)

> Separation Walls:

1. Section CBC 419.2 and IRC R317:

Currently the CBC requires walls separating dwelling units in the same building and walls separating sleeping units in the same building to be 1-hr fire resistive with complying penetrations.

We are getting many more single family dwellings with so called “carriage houses” or “extra living spaces”, without full kitchens, but with bathrooms, a closet and a separate entrance, attached to the main house. These would not fall under the definition of a dwelling unit but may fall under the definition of a sleeping unit. (Chapter 2 of CBC and IRC) However, the IRC does not have separation requirements for sleeping units in R317 only attached dwelling units (Duplex & Halfplex) and townhouses. Is it the intent to have a fire separation at the walls in this type of an application for R3’s? (Jerri Borow)

Section 2

Views
Represent

Please answer the following before submitting your comments.

☐ Responses represent my views as an individual

☒ Responses represent a consensus of members of an organization I represent *

*Comments include all responses from Stakeholders General Group IRC project

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